

1 JESSICA L. GRANT (SBN 178138)  
2 JONATHAN A. PATCHEN (SBN 237346)  
3 TAYLOR & COMPANY LAW OFFICES, LLP  
One Ferry Building, Suite 355  
4 San Francisco, California 94111  
Telephone: (415) 788-8200  
Facsimile: (415) 788-8208  
E-mail: [jgrant@tcolaw.com](mailto:jgrant@tcolaw.com)  
5 E-mail: [jpatchen@tcolaw.com](mailto:jpatchen@tcolaw.com)

6 | Attorneys for Defendant SOFTSCAPE, INC.

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

Case No.: C-08-1376 (CW)

**MOTION FOR ADMINISTRATIVE  
RELIEF TO FILE UNDER SEAL THE  
DECLARATION OF DAVID WATKINS  
IN OPPOSITION TO PLAINTIFF'S  
MOTION TO STRIKE AND IN  
RESPONSE TO ORDER TO SHOW  
CAUSE**

Date: March 27, 2008  
Time: 2:00 p.m.  
Dept.: Courtroom 2

Honorable Claudia Wilken

22 Pursuant to Civil Local Rule 7-11 and 79-5, defendant Softscape, Inc. (“Softscape”) hereby  
23 moves the Court for an Order permitting Softscape to file under seal in this Court the Declaration  
24 of David Watkins in Opposition to Plaintiff’s Motion to Strike and in Response to Order to Show  
25 Cause on the grounds that the Presentation (attached as Exhibit 1 to the Declaration of Robert  
26 Bernshteyn In Support of Plaintiffs Ex Parte Application for TRO and OSC Re Preliminary  
27 Injunction) that is referenced and quoted extensively in the Watkins declaration has been filed  
28 under seal pursuant to Order of this Court.

The declaration includes allegedly confidential, commercially sensitive, and proprietary information contained in a documents previously filed under seal by SuccessFactors in this proceeding, the public accessibility of which could cause competitive and/or commercial harm. It also contains business information that is confidential and proprietary to Softscape. As such, Softscape respectfully requests that the Court allow it to file under seal the declaration of David Watkins, as redacted in part, pursuant to Local Rule 79-5.

8 | Dated: March 26, 2008

Respectfully submitted,

TAYLOR & COMPANY LAW OFFICES, LLP

By: /s/ Jessica L. Grant

Jessica L. Grant

Attnorneys for Defendant SOFTSCAPE, INC.